

EXHIBIT 131

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF RICK MIRANDA

I, RICK MIRANDA, declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I am the Provost and Executive Vice President at Colorado State University. I joined the faculty at Colorado State University as an Assistant Professor in 1982. I became Chair of the Department of Mathematics in 1997, and Dean of the College of Natural Sciences in 2002. I became Provost and Executive Vice President in 2009, and my responsibilities include overseeing academic programming and faculty affairs on campus to help fulfill the land-grant mission of Colorado State University. Specifically, as Provost and Executive Vice President, I manage the areas of Enrollment and Access, Research, Student Affairs, University Operations, Faculty Affairs, International Affairs, Information Technology, Libraries, Undergraduate Affairs, and all eight colleges at Colorado State University.
3. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I lack personal knowledge, have reviewed information gathered from university records by my staff and others within the organization.
4. Colorado State University is a comprehensive graduate research institution and offers comprehensive array of baccalaureate, master's, and doctoral programs, and the university holds exclusive statewide authority for programs in agriculture, forestry, natural resources, and veterinary medicine. As Colorado's land-grant university, Colorado State University has a unique mission in the state of Colorado. The land-grant concept of a balanced program of teaching, research, extension, public service, and engagement provides the foundation for the university's teaching and research programs. In addition, as Colorado's land-grant university,

Colorado State University has a mission to provide access to a high-quality, affordable education to all with the talent and commitment to earn a CSU degree.

5. Colorado State University is committed to a foundational principle of inclusive excellence, recognizing that our institutional success depends on how well we welcome, value, and affirm all members of the Colorado State University community. Only through the inclusion of the rich diversity of students, staff, faculty, administrators, and alumni can the university – a marketplace of ideas -- truly be excellent in its pursuits.

6. At Colorado State University, we believe that diversity benefits everyone. Engaging with people from all walks of life and backgrounds allows students to experience new and unique ways of thinking. Colorado State University students who are registered in the Deferred Action for Childhood Arrivals (DACA) program are critical to this effort. Most of these students are the first in their families to go to college. They have different life experiences and perspectives that enhance the learning environment, and they also tend to be high academic achievers. DACA students are an integral part of the Colorado State University community and an asset to the state of Colorado; these are students who are excelling in highly competitive and challenging majors who are highly likely to remain in Colorado and contribute as taxpayers and skilled workers once they graduate. Nearly all of these students graduated from Colorado high schools and have strong family ties to the state. For most, it is the only home they know.

7. The State of Colorado supports Colorado State University's efforts to recruit students enrolled in the DACA program. In 2013, the Governor signed into law Senate Bill 13-033, known as the ASSET Bill, which permits students who are eligible for DACA to pay in-state tuition at any Colorado public college or university. DACA students may also apply for College Opportunity Fund stipends to offset the cost of their education.

8. There are approximately 189 students who are enrolled at Colorado State University and participate in the DACA program. If the DACA program is discontinued, many of the currently admitted Colorado State University students who are participating in that program will likely not be able to continue their studies at the university. They will lose their ability to work legally, and therefore lose the ability to support themselves while pursuing their educational studies. Many also have an understandable fear that they will be deported. Also, those DACA students pursuing a degree that requires non-classroom work experience will find their path to graduation blocked. Further, if some of these students nevertheless remain enrolled and graduate, they will find themselves unable to find employment.

9. If these Colorado State University students are unable to continue their education because DACA is rescinded, I have concerns that the university community and Colorado will lose the significant contributions that these students bring to the overall academic and educational experience at Colorado State University. They expand the intellectual vigor of the university and increase the diversity of the university community. In addition, losing those DACA students would result in the loss of more than approximately \$4.5 million dollars in revenue for the university, assuming those students are full-time and living on campus. The loss of these DACA students would have a significant negative impact on the university's operating budget.

10. I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and complete to the best of my knowledge.

DATED this 26th day of September, 2017.

A handwritten signature in dark ink, appearing to read "Rick Miranda", is written over a horizontal line.

RICK MIRANDA